

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

MAR 02 2015

Clerk of Court

United States of America

v.

Juan Jesus Delarosa

YOB: 1990, USC

Case No. M-15-0324-M

Defendant

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of March 1, 2015 in the county of Hidalgo in the Southern District of  
Texas, the defendant violated 22 U. S. C. § 2778  
an offense described as follows:

Knowingly and willfully attempted to export and cause to be exported into the United Mexican States from the United States of America defense articles, that is, to wit: Approximately 1000 rounds of 7.62 X 39MM caliber ammunition which are designated as defense articles on the United States Munitions List, without having first obtained from the Department of State a license for such export or written authorization for such export.

This criminal complaint is based on these facts:

See Attachment "A".

☒ Continued on the attached sheet

Approved  
Joseph Leonard




Complainant's signature

Jonathan Rivera, CBP Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/02/2015City and state: McAllen, Texas


Judge's signature

Dorina Ramos, U.S. Magistrate Judge

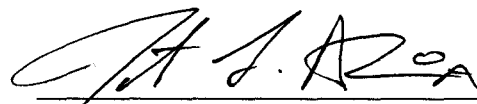
Printed name and title

**Attachment A**

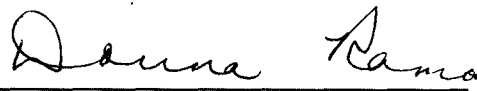
On March 1, 2015, Homeland Security Investigations (HSI) Special Agents (SA's) were conducting surveillance of Juan Jesus DELAROSA. SA's observed DELAROSA purchase a large amount of ammunition at a Federal Firearms Licensee (FFL) in Weslaco, Texas. SA's continued surveillance on DELAROSA as he travelled to another FFL in Edinburg, Texas, where SA's observed DELAROSA make another large purchase of ammunition. SA's followed DELAROSA to his residence in Donna, Texas, where they observed DELAROSA rearranging items in the trunk area of his vehicle, a silver Volkswagon Jetta, displaying dealer license plates 82T0337. SA's observed that DELAROSA spent over an hour rearranging items in the vehicle's trunk.

U. S. Customs and Border Protection Officers (CBPO's) were conducting outbound operations at the Progreso International Port of Entry (POE), Hidalgo, Texas, when they observed DELAROSA's vehicle approaching the outbound lane. SA's observed DELAROSA exit the vehicle at a nearby duty free store and begin to walk outbound via the pedestrian walk lane. CBPO's identified the driver as L. A. Z., a minor. L.A.Z. made a negative declaration for currency, ammunition, and firearms. CBPO's referred the vehicle for secondary inspection. At secondary inspection, CBPO's discovered approximately 1000 rounds of 7.62X39MM ammunition concealed in the vehicle's rear quarter panel area inside the vehicle trunk.

L.A.Z. was provided his written Miranda rights by HSI SA's in the English language and voluntarily agreed to give a statement without the presence of an attorney. L.A.Z. stated that he was with his brother-in-law, Juan Jesus DELAROSA, earlier that day when DELAROSA purchased two large bags of ammunition from a sporting goods store located in Weslaco, Texas. DELAROSA reportedly instructed L.A.Z. to cross the vehicle and ammunition into Mexico via the Progreso POE and to pick DELAROSA up on the Mexico side of the bridge. L.A.Z. advised that DELAROSA had been dropped off at the duty free store prior to driving the vehicle to the outbound lane at the Progreso POE. DELAROSA was located at the pedestrian outbound lane and was detained for questioning. DELAROSA was provided his written Miranda rights by Homeland Security Investigations Special Agents in the English language. DELAROSA declined to answer questions without an attorney present.

  
Jonathan Rivera, CBP TFO  
Homeland Security Investigations

Sworn to before me and signed in my presence on March 2, 2015, in McAllen, Texas.

  
Dorina Ramos  
United States Magistrate Judge